

Near-Term Task Force Recommendations 2.1 and 2.3: Flooding – NRC's Perspective

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Outline

- Background
- · Guidance for the Recommendations
- · Flood Protection Walkdowns
- · Flooding Hazard Reevaluation
- Integrated Assessment

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Background

- NRC established Near-Term Task Force (NTTF) in response to Fukushima Dai-ichi events in March 2011
- · NTTF Recommendation 2.3 Flooding
 - Develop flood protection walkdown procedures
 - Perform walkdowns using NRC-endorsed walkdown methodology
 - Identify and address degraded, non-conforming or unanalyzed conditions
- NTTF Recommendation 2.1 Flooding
 - Reevaluate all potential external flooding hazards
 - Collect information to facilitate NRC's determination if there is a need for additional regulatory actions
 - Subsume 'Generic Issue' on potential for NPP site flooding following failure of upstream dam(s)

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Guidance for Performing the Recommendations

Flood Protection Walkdowns

- NEI 12-07, "Guidelines for Performing Verification Walkdowns of Plant Protective Features" (May 2012)
- NRC endorsement letter of flood protection walkdowns performed and reported in accordance with NEI 12-07 [May 2012; ML12144A142].

· Hazard Reevaluations

- NRC Interim Staff Guidance, JLD-ISG-2012-06, "Guidance for Performing a Tsunami, Surge, or Seiche Hazard Assessment," Final Issued in January, 2013 [ML12314A412].
- NRC Interim Staff Guidance, JLD-ISG-2013-01, "Guidance for Estimating Flooding Hazards Due to Dam Failure," Draft Available for Public Comment in March 2013.

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Guidance for Performing the Recommendations

· Integrated Assessment

- NRC Interim Staff Guidance, JLD-ISG-2012-05, "Guidance for Performing the Integrated Assessment for External Flooding," Final Issued in November, 2012 [ML12311A214].
- All guidance documents (NEI 12-07 and three ISGs) are the product of significant interactions between the NRC, NEI, and other stakeholders at numerous public meetings and submitted written comments.

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Walkdowns: General Considerations

- Flood protection walkdowns gathered information while the longer-term flood hazard reevaluations are being completed (March 2013-March 2015).
- <u>Deficiency</u>: a flood protection feature unable to perform its intended flood protection function when subject to a design basis flooding hazard
 - Walkdown observations that may be potential deficiencies were evaluated by each licensee in accordance with station processes and entered into the licensee's Corrective Action Program (CAP).
 - Observations determined by the CAP to be deficiencies were reported to the NRC in the Walkdown Report.
- Walkdown reports were submitted to the NRC by November 27, 2012 [publically available].

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Walkdown Report Reviews

- · Staff review of licensee reports are underway
- · Observations:
 - All licensees committed to using NEI 12-07 guidance
 - Licensee reports identify:
 - $\circ\;$ Plant-specific degraded, nonconforming, or analyzed conditions
 - o Actions taken or planned to further enhance site flood protection
 - Described the adequacy of programs, monitoring, and maintenance for the flood protection features
- Next Steps for NRC Staff -

Assessment Reports to Verify if:

- licensee responded appropriately
- licensee followed NEI 12-07 guidance
- no outstanding information is expected
- staff have no immediate safety concerns

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Flood Hazard Reevaluations

- Hazard Reevaluation is due from each licensee on an NRC-assigned due date [May 2012 letter; ML12097A509].
- Due date is either: March 2013, 2014, or 2015
- NRC staff used the following criteria to assign the schedule for completing the reevaluations:
 - What is the potential that an integrated assessment will have to be conducted based upon the reevaluated hazard?
 - How quickly can the flooding hazard reevaluation be completed?
 - How can industry and NRC staff resources be most effectively and efficiently applied?

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22 Year-1 (March 2013) Sites



24 Year-2 (March 2014) Sites



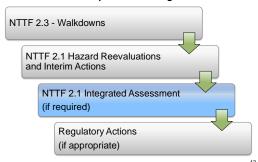
20 Year-3 (March 2015) Sites



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Integrated Assessment: When is it performed?

· Not all licensees will perform an Integrated Assessment:





Integrated Assessment: Purpose

· The integrated assessment:

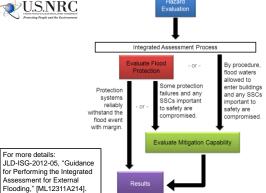
- evaluates the total plant response to external flood hazards
- considers both the protection and mitigation capabilities of the plant
- may use all available resources with appropriate justification

· The purpose of the integrated assessment is to:

- evaluate the effectiveness of the current licensing basis against the new hazard based on current regulatory guidance
- identify plant-specific vulnerabilities due to external flood hazards and other important insights
- assess the effectiveness of existing or planned protection for flood conditions and mitigation of flood consequences for the entire duration of a flooding event

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For more details:

Assessment for External

Conclusions

- · Significant quantity of guidance produced in last year.
 - Guidance is the product of numerous interactions between the NRC, NEI, and other stakeholders at numerous public meetings and submitted written comments.
- · Licensees have completed all walkdown reports
 - NRC staff review is underway
- · Year-1 Hazard Reviews
 - 22 sites scheduled to submit this month
- · Integrated Assessments
 - Assessments will likely begin for a few Year-1 sites
 - Assessments are expected to take up to two years.
 - NRC will hold public meetings during initial application Integrated Assessment guidance to facilitate lessons-learned.

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